

# EXHIBIT D

# EXHIBIT 2

CAUSE NO. 2022CI11011

IVAN SMITH,	§	IN THE DISTRICT COURT
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	
UBER TECHNOLOGIES, INC.; PORTIER,	§	57 <sup>TH</sup> JUDICIAL DISTRICT
LLC d/b/a UBER EATS; RAISER, LLC;	§	
CARLA REYES TREVINO; JOSHUA	§	
ALDANA and RUBEN MALDONADO JR.,	§	
	§	
<i>Defendants.</i>	§	BEXAR COUNTY, TEXAS

**DEFENDANTS UBER TECHNOLOGIES, INC., PORTIER, LLC,  
AND RASIER, LLC'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S  
FIFTH SET OF REQUESTS FOR PRODUCTION**

TO: Plaintiff IVAN SMITH, by and through his lead counsel of record, Bret Stanley of the JOHNSON LAW GROUP, 2925 Richmond Ave., Ste. 1700, Houston, Texas 77098.

Pursuant to Rule 196 of the Texas Rules of Civil Procedure, Defendants Uber Technologies, Inc., Portier, LLC, and Rasier, LLC ("Uber Defendants") hereby serve their Objections and Responses to Plaintiff's Fifth Set of Requests for Production.

**BOWMAN AND BROOKE LLP**

By: /s/ Angela L. Angotti  
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**ATTORNEYS FOR DEFENDANTS  
UBER TECHNOLOGIES, INC., PORTIER,  
LLC and RASIER, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 20, 2025, a true and correct copy of the foregoing document was served electronically upon all counsel of record pursuant to the Texas Rules of Civil Procedure.

/s/ Angela L. Angotti

Angela L. Angotti

70	Produce documents that indicate Uber's system flagged Joshua Aldana (UUID [REDACTED]) as making [REDACTED] deliveries.	No responsive documents to produce.	
71	[REDACTED]	Request was determined to be a violation of the MDL protective order by Plaintiff's counsel Bret Stanley.	
72	Produce every NUDGE Uber sent to Joshua Aldana (UUID [REDACTED]) Included with this production, produce the contents of the Nudge, the time the Nudge was sent, the method the Nudge was sent, and whether the Nudge resulted in an impression in Uber's system that it was seen by Joshua Aldana.	Nothing to produce. See previous responses.	